UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

CLERK, U.S. PIETRICT COURT
WESTERN DISTRICT COURT
DEBUT CLERK

UNITED STATES OF AMERICA

v.

CRIM NO.

GAVIN FRIEDMAN

SA19CR0350 FB

INDICTMENT

The Grand Jury Charges:

Count One
Threat Against the President
(Violation of 18 U.S.C. § 871(a))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, did knowingly and willfully deposit for conveyance in the mail and for a delivery from a post office and by a letter carrier a letter, paper, writing, print, missive, and document containing a threat to take the life of the President of the United States.

Count Two Mailing Threatening Communications (Violation of 18 U.S.C. § 876(c))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to the Office of the County Clerk, at 700 East Main Street, Kerrville, Texas 78028, and containing a threat to injure a United States judge, specifically, United States District Judge David Ezra of the Western District of Texas.

Count Three Mailing Threatening Communications (Violation of 18 U.S.C. § 876(c))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to the Office of the County Clerk, at 700 East Main Street, Kerrville, Texas 78028, and containing a threat to injure a federal law enforcement officer and an official who is covered by Title 18, U.S.C., Section 1114, specifically, the Director of the Federal Bureau of Investigation.

Count Four Mailing Threatening Communications (Violation of 18 U.S.C. § 876(c))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to the Office of the County Clerk, at 700 East Main Street, Kerrville, Texas 78028, and containing a threat to injure an official who is covered by Title 18, U.S.C., Section 1114, specifically, the Director of the Central Intelligence Agency.

Count Five Explosive Materials—Willfully Making a Threat (Violation of 18 U.S.C. § 844(e))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, through the use of the U.S. mail, in and affecting interstate commerce, willfully made a threat concerning an attempt being made and to be made to unlawfully damage and destroy real or personal property belonging to the U.S. Department of Defense, specifically, Fort Sam Houston, located in San Antonio, Texas, by means of an explosive.

Count Six Explosive Materials—Willfully Making a Threat (Violation of 18 U.S.C. § 844(e))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, through the use of the U.S. mail, in and affecting interstate commerce, willfully made a threat concerning an attempt being made and to be made to unlawfully damage and destroy real or personal property belonging to the government of the United States of America, specifically, the Federal Building in San Antonio, Texas, by means of an explosive.

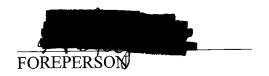
Count Seven Explosive Materials—Willfully Making a Threat (Violation of 18 U.S.C. § 844(e))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, through the use of the U.S. mail, in and affecting interstate commerce, willfully made a threat concerning an attempt being made and to be made to unlawfully damage and destroy real or personal property belonging to the government of the United States of America, specifically, Lackland Air Force Base, located in San Antonio, Texas, by means of an explosive.

Count Eight Explosive Materials—Willfully Making a Threat (Violation of 18 U.S.C. § 844(e))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, through the use of the U.S. mail, in and affecting interstate commerce, willfully made a threat concerning an attempt being made and to be made to unlawfully damage and destroy real or personal property belonging to the government of the United States of America, specifically, National Security Agency Headquarters, located at Fort Meade, Maryland, by means of an explosive.

A TRUE BILL



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